



**The Commonwealth of Massachusetts**  
**DEPARTMENT OF**  
**TELECOMMUNICATIONS AND ENERGY**

WESTERN MASSACHUSETTS ELECTRIC COMPANY

D.T.E. 05-91

FIRST SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF  
TELECOMMUNICATIONS AND ENERGY TO  
WESTERN MASSACHUSETTS ELECTRIC COMPANY

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Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy ("Department") submits to Western Massachusetts Electric Company ("WMECo" or "Company") the following Information Requests:

INSTRUCTIONS

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning

documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.

5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please file one copy of the responses with Mary L. Cottrell, Secretary of the Department and with all parties; also submit two (2) copies of the responses to John J. Geary, Hearing Officer; one (1) copy of the responses to Sean Hanley, Assistant Director, Rates and Revenue Requirements Division; one (1) copy of the responses to Mauricio Diaz, Analyst, Rates and Revenue Requirements Division; and one (1) copy of the responses to Miguel Maravi, Analyst, Rates and Revenue Requirements Division.

For Bulk Responses, one (1) copy should be submitted directly to John Geary and one (1) copy should be submitted directly to Sean Hanley

8. All non-proprietary responses should be submitted by e-mail to [dte.efiling@state.ma.us](mailto:dte.efiling@state.ma.us) and to the e-mail address of any party required to be served.
9. Responses are due by the close of business (5:00 p.m.) Thursday, December 15, 2005.

### INFORMATION REQUESTS

- DTE 1-1      Please refer to Article I of the amended offer of settlement (“Settlement”) approved by the Department in Western Massachusetts Electric Company, D.T.E. 04-106 (2004). Assume that there are no exogenous costs contained in the December 1, 2005, compliance filing (“Compliance Filing”) to D.T.E. 04-106. Please (a) demonstrate how WMECo’s Compliance Filing results in rates that are lower than the rates in effect prior to the Department’s approval of the Settlement in D.T.E. 04-106; (b) provide new rate tariffs for the Compliance Filing that comply with the Settlement but exclude recovery of exogenous costs; and (c) recalculate Attachment 3 of the Compliance Filing

using calendar year 2004 billed sales, and explain in detail why the Company used billed sales for the twelve-month period ended August 1997. Provide all workpapers, calculations, and assumptions.

- DTE 1-2 Please refer to the Settlement at Article V and Department Letter re: Annual Returns (April 3, 2003). Provide the Company's return on equity calculation with all relevant information, workpapers, calculations, and assumptions required to demonstrate operation of the earning sharing mechanism.
- DTE 1-3 Please refer to Compliance Filing, Attachment 8, at 1. Provide the Company's method and assumptions for determining all estimated and forecasted amounts. In addition, explain why New England Power Pool and Independent System Operator - New England expenses forecasted for 2006 are significantly higher than the same expenses as estimated during 2005. Provide all supporting workpapers and calculations.
- DTE 1-4 Please refer to the Compliance Filing, Attachment 8, at 2. For those transmission expenses that were forecasted, on what date will the forecasted transmission expenses become actual expenses?
- DTE 1-5 Please refer to Compliance Filing, Attachment 3, at line 30. Are the proposed distribution rates designed to increase the Company's distribution revenues by \$2,234,239? If yes, explain why the Company did not seek recovery of the entire \$3.0 million as stipulated in Article II of the Settlement. If no, provide the increase in distribution revenues that the proposed rates are designed to recover, with all supporting workpapers and calculations.